

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JULIO CESAR MENDOZA CHAVEZ,)	
Plaintiff)	
)	
V.)	
)	CIVIL ACTION NO.05-11379 MLW
)	
MICHAEL CHERTOFF, as Secretary of the)	
Department Homeland Security; BRUCE)	MOTION FOR EXTENSION
CHADBOURNE, Field Director for Detention)	OF TIME TO RESPOND
and Removal, New England Field Office,)	
United States Immigration and Customs)	
Enforcement; ANDREA J. CABRAL, Suffolk)	
County Sheriff; GERARD HORGAN, Superin-)	
tendent, Suffolk County House of Corrections;)	
MICHAEL GARCIA, Assistant Secretary,)	
United States Immigration and Customs)	
Enforcement; and ALBERTO GONZALES,)	
Attorney General of the United States)	
Defendants)	

Plaintiff Julio Cesar Mendoza Chavez, through his attorney, Vard R. Johnson, herewith moves the Court for an order extending Plaintiff's time to respond to Defendants' Motion to Dismiss to July 22, 2005. In support of this Motion, Plaintiff shows the Court as follows:

1. Defendants filed with the Court on July 6, 2005 their Motion to Dismiss, claiming this Court lacked jurisdiction over Plaintiff's case.
2. Plaintiff's attorney, Vard R. Johnson, obtained additional information regarding Plaintiff's case on July 19, 2005 which Plaintiff's attorney needs to discuss with Plaintiff and with Plaintiff's family before responding to the Motion to Dismiss. Plaintiff's attorney reasonably expects to complete his discussions by July 22, 2005.

3. Assistant United States Attorney Mark Grady told Vard R. Johnson that he would pose no objection to this Motion.

Wherefore, Plaintiff respectfully requests the Court to extend Plaintiff's time to respond to Defendants' Motion to Dismiss to July 22, 2005.

Julio Cesar Mendoza Chavez, Plaintiff

By /s/ Vard R. Johnson
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Certificate of Compliance

I certify that I contacted counsel for the Defendants regarding the relief sought by way of this Motion.

/s/ Vard R. Johnson
Vard R. Johnson, Plaintiff's Attorney